

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: ROBERT M SERVI JR ) Case No. 19 B 02505  
JULIA M SERVI )  
Debtors ) Chapter 13  
)  
) Judge: DONALD R CASSLING

**NOTICE OF MOTION**

ROBERT M SERVI JR  
JULIA M SERVI  
801 E MINER ST #1D  
ARLINGTON HEIGHTS, IL 60004

CUTLER & ASSOC  
via Clerk's ECF noticing procedures

Please take notice that on April 25, 2019 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on March 22, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On January 29, 2019 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan - #2.3 provide tax refund language.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

Respectfully submitted,

/s/ Tom Vaughn